

Presentment Date and Time: December 26, 2017 at 12:00 p.m. (Eastern Time)  
Objection Deadline: December 26, 2017 at 11:30 a.m. (Eastern Time)

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	: Chapter 11
Gawker Media LLC, <i>et al.</i> , <sup>1</sup>	: Case No. 16-11700 (SMB)
Debtors.	: (Jointly Administered)
	: Related Docket Nos. 985, 1006, 1015, 1063

**NOTICE OF SETTLEMENT**

**PLEASE TAKE NOTICE** that, pursuant to Rule 9074-1 of the Local Rules of

Bankruptcy Procedure for the Southern District of New York, the proposed order annexed hereto

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<sup>1</sup> The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.'s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10020. Gawker Hungary Kft's mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10020.

as Exhibit A (the “Proposed Order”) will be presented for settlement and entry to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at Room 723 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004-1408 (the “Court”) for signature on Wednesday, December 26, 2017 at 12:00 p.m. (prevailing Eastern Time).

**PLEASE TAKE FURTHER NOTICE** that, objections to the entry of the Proposed Order or proposed counter-orders must be in writing and shall be filed with the Court (with a courtesy copy delivered to the chambers of the Honorable Stuart M. Bernstein) and served so as to be actually received by the undersigned not later than 11:30 a.m. on Wednesday, December 26, 2017 (prevailing Eastern Time).

**PLEASE TAKE FURTHER NOTICE** that, unless objections or proposed counterorders are filed and served as set forth above, the Proposed Order will be deemed uncontroverted and may be entered by the Court.

Dated:           New York, New York  
December 18, 2017

Respectfully Submitted,

**LATHAM & WATKINS LLP**

/s/ Peter M. Gilhuly

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